

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 23-80096-CR-CANNON

UNITED STATES OF AMERICA,

Plaintiff,

vs.

HOOBESH KUMAR DOOKHY,

Defendants.

_____ /

**DEFENDANT'S OBJECTIONS TO PRESENTENCE
INVESTIGATION REPORT**

Defendant, Hoobesh Dookhy, through undersigned counsel, files the following objections to the presentence investigation report (PSI). Specifically, Defendant states:

1. As to the alleged offense conduct (PSI ¶¶ 5 through 11) Defendant only admits to those facts contained in the "Factual Basis In Support Of Guilty Plea" (DE 49). Any allegations beyond this factual basis are disputed and objected to by Defendant.

2. As to PSI ¶ 16, the offense did not involve criminal sexual abuse or attempt to commit criminal sexual abuse as defined in 18 U.S.C. § 2241 or § 2242. Therefore, pursuant to U.S.S.G. § 2A3.4(a), the base offense level is 12. With a two level reduction for acceptance of responsibility, Defendant's total offense level is 10.

3. With a total offense level of 10, and a criminal history category I, Defendant's advisory guideline range is 6 to 12 months imprisonment.

Respectfully submitted,

MICHAEL CARUSO
FEDERAL PUBLIC DEFENDER
s/ *Peter Birch*
Peter Birch
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CERTIFICATE OF SERVICE

I hereby certify that on December 29, 2023, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day on all counsel of record via transmission of Notices of Electronic Filing generated by CM/ECF or in some other authorized manner for those counsel or parties who are not authorized to receive electronically Notices of Electronic Filing.

s/ *Peter Birch*
Peter Birch